

1 TRINETTE G. KENT (State Bar No. 222020)
2 10645 North Tatum Blvd., Suite 200-192
3 Phoenix, AZ 85028
4 Telephone: (480) 247-9644
5 Facsimile: (480) 717-4781
6 E-mail: tkent@leberglaw.com

7 Of Counsel to
8 Lemberg Law, LLC
9 A Connecticut Law Firm
10 1100 Summer Street
11 Stamford, CT 06905
12 Telephone: (203) 653-2250
13 Facsimile: (203) 653-3424

14 Attorneys for Plaintiff,
15 Jim Downey

16
17 UNITED STATES DISTRICT COURT
18 SOUTHERN DISTRICT OF CALIFORNIA
19

20 Jim Downey,

21 Plaintiff,

22 vs.

23 Northstar Location Services, LLC; and
24 DOES 1-10, inclusive,

25 Defendants.

Case No.: 3:15-cv-00033-BAS-MDD

**NOTICE OF VOLUNTARY
DISMISSAL**

1 **NOTICE OF WITHDRAWAL OF COMPLAINT AND**
2 **VOLUNTARY DISMISSAL OF ACTION WITH PREJUDICE**
3 **PURSUANT TO RULE 41(a)**

4 Jim Downey (“Plaintiff”), by Plaintiff’s attorney, hereby withdraws the
5 complaint and voluntarily dismisses this action, with prejudice, pursuant to Fed. R.
6 Civ. P. 41(a)(1)(A)(i).
7

8 By: /s/ Trinette G. Kent
9 Trinette G. Kent, Esq.
10 Lemberg Law, LLC
11 Attorney for Plaintiff, Jim Downey
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 **CERTIFICATE OF SERVICE**

2 I, the undersigned, certify and declare that I am over the age of 18 years, and
 3
 4 not a party to the above-entitled cause. On April 23, 2015, I served a true copy of
 5 foregoing document(s): **NOTICE OF VOLUNTARY DISMISSAL.**

6
 7 **BY ELECTRONIC FILING:** I hereby **Attorney for Defendants Northstar**
 8 certify that on April 23, 2015, a copy of **Location Services, LLC**
 9 the foregoing document was filed
 10 electronically. Notice of this filing will be
 11 sent by operation of the Court's electronic
 12 filing system to all parties indicated on
 13 the electronic filing receipt. All other
 14 parties will be served by regular U.S.
 15 Mail. Parties may access this filing
 16 through the Court's electronic filing
 17 system.
 18 Tel.:
 19 Fax:
 20 Email:

21 I am readily familiar with the firm's practice of collection and processing
 22 correspondence for mailing. Under that practice it would be deposited with the U.S.
 23 Postal Service on that same day with postage thereon fully prepaid in the ordinary
 24 course of business. I am aware that on motion of the party served, service is presumed
 25 invalid if postal cancellation date or postage meter date is more than one day after the
 26 date of deposit for mailing in affidavit.

27 I hereby certify that I am employed in the office of a member of the Bar of this
 28 Court at whose direction the service was made.

1 Executed on April 23, 2015.

2
3 By: /s/ Trinette G. Kent
4 Trinette G. Kent, Esq.
5 Lemberg Law, LLC
6 Attorney for Plaintiff, Jim Downey
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28